



# Range

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## **Eligible Objectors & Interested Persons for this issue:**

- Washington Cattleman's Association
- Justin Hedrick
- Sierra Club/Alliance for the Wild Rockies
- Stevens County Commissioners
- Pend Oreille County Commissioners
- The Lands Council

## **Objections:**

- The Aquatic and Riparian Conservation Strategy (ARCS)-mod standards and guidelines impose unreasonable restrictions and are not needed because (1) current riparian management strategies are effective in maintaining or improving conditions, (2) the ARCS-mod lacks flexibility to adapt to site-specific conditions, and (3) the ARCS restrictions will degrade riparian resources.
- The stubble height requirement is too restrictive and limits adaptability. For example, it does not allow for site specific conditions, such as places where 4-inches is not attainable, or research that shows 2.75 inches is adequate. Riparian area components are too prescriptive and restrictive vs. grazing should be completely eliminated in riparian areas to restore degraded habitats. Stubble height should be 6-inches.
- MA-STD-RMA-01-Standard is vague, but contains "shall" language indicating the standard will be strictly enforced. MA-STD-RMA-09 lacks clarity, but could result in the removal of livestock from the forest.
- Recommended wilderness, designation of backcountry areas and increased fire frequency will increase costs of livestock grazing.
- The Watershed Condition Framework creates a new model for range monitoring. The model raises issues with new grazing standards, and such standards will make it difficult or impossible for ranchers to successfully graze on federal lands.
- The final Environmental Impact Statement (FEIS) livestock related climate change analysis lacks scientific integrity.
- The FEIS does not adequately analyze or disclose grazing impacts related to: noxious weed spread, soil damage, upland and riparian vegetation changes, changes in fire behavior, expected annual cost of infrastructure maintenance and installation, and impacts on wildlife.
- The FEIS does not adequately disclose the amount of direct, indirect or cumulative effects regarding site-specific damage caused by cattle grazing within the cumulative effects are on state, private, and National Forest grounds.
- The Forest Service did not conduct a thorough and scientifically based suitability and capability determination. In addition, there are no Standards in the revised Land Management Plan (LMP) that direct such a determination be undertaken at the allotment-specific level. Range capability guidance suggests lands incapable of producing 2,100 lbs/acre/year of forage be removed from consideration from grazing. The Colville National Forest altered this Standard to 50 lbs./acre/year. This alteration is arbitrary and capricious. The suitability analysis is incorrect. Suitability and Capability were determined without monitoring data.



- Neither the FEIS nor the revised LMP discuss or disclose the Forest Service's methodology or rationale for determining the number of capable acres for grazing within the planning area, nor do they provide data to justify their determination. Without detailed explanations of the agency's process for determining grazing capability, the FEIS and revised LMP do not satisfy the National Environmental Policy Act (NEPA) or the National Forest Management Act.
- Desired conditions have replaced measure able and quantitative INFISH standards.
- The FEIS did not adequately assess the capacity of the Forest Service to manage its proposed grazing program and to adjust the scope of the grazing program to reflect contextual conditions.
- In the case of the FEIS, the Forest Service fails to analyze any near-term alternatives that contain interim standards or actual changes to grazing management. This is a violation of NEPA.
- The FEIS violates NEPA by (1) failing to disclose information about its methodologies, (2) lacking scientific accuracy and integrity, and (3) failing to properly analyze and disclose cumulative effects.
- Grazing is an effective fire management tool.
- Grazing has created a more fire prone forest, susceptible to mega-fires and should be eliminated.
- The revised LMP needs to contain objective, quantitative, measurable grazing standards. If a watershed does not meet certain measurable standards, there should be a way to suspend grazing.
- Factoring and modeling does not provide site-specific information regarding suitability. Without standards and guidelines requiring annual monitoring of the variety of biological eco-zones where grazing does occur, there is no basis in the range model to guide allotment management.

### **Resolution Options Proposed by Objectors:**

- Consistent with the best science and the limited capacity of all Colville National Forests' rangeland to grow 4 inches of stubble height, the revised LMP should either change the guideline to 2.75-8 inches or eliminate the stubble height requirement and adopt a site-specific approach to managing riparian areas through allotment management plans with general guidance to maintain or improve riparian conditions. The percent utilization restrictions also should be relaxed to the current levels in permits and the need for any more stringent limits on utilization should be adopted through the allotment management plan. [Washington Cattleman's Association]
- Use flexible and concise language that allows for practical implementation of project activities when riparian management areas are properly functioning, such as "should" in place of "shall." [Washington Cattleman's Association]
- The Colville National Forest should use flexible and concise language that allows for practical implementation of project activities. [Washington Cattleman's Association]



- The Colville National Forest should develop an alternative that meets the needs for livestock grazing; the Colville National Forest should be identifying ways to increase livestock grazing, meeting the unfilled local demand, rather than burdening the current permittees with increased costs. [Washington Cattleman's Association]
- The USFS should not ignore the benefit that grazing contributes to limiting the increased risk wildfire. [Washington Cattleman's Association]
- Remove reference of Watershed Condition Framework in the revised LMP [Washington Cattleman's Association]
- Return to range capability guidelines that remove lands incapable of producing 200 lbs./acre/year of forage from grazing. [The Lands Council]
- Return to the 6 inch stubble height forage management parameter in the revised LMP. [The Lands Council]
- Set an adhered-to schedule of forage monitoring and posting results for public access. [The Lands Council]
- Each allotment should be evaluated for suitable forage and results posted for public access. [The Lands Council]
- Modify Allotment Management Plans and Allotment Operating Instructions, and put into place Forest-Wide Standards and Guidelines for the following: [The Lands Council]
  - Livestock grazing should only be permitted on acreage considered capable/suitable.
  - Livestock grazing should only be permitted in open, defensible spaces. Failure to limit grazing to these spaces puts livestock and wildlife in harm's way.
  - Livestock will not be released or managed in areas within one mile of a known active wolf site, den, or rendezvous. Wildlife management should implement appropriate seasonal restrictions based on site specific consideration and potential activity effects, to reduce disturbance to wolves and protect livestock.
  - Do not authorize turnout of livestock in an area of known (during the same calendar year that use is documented) wolf den or rendezvous site. Alternative grazing site away from known wolf areas should be offered when possible.
  - Do not authorize turnout or grazing of sick or injured livestock.
  - Remove sick and injured livestock and remove carcasses so they do not become predator attractants.
  - Do not authorize salt or other livestock attractants near a known active wolf den or rendezvous site.
  - Remove livestock from grazing allotments when conflict with wolves or other wildlife occurs.
  - Require a 24 hour human presence on an allotment following documented conflict with wolves or other wildlife to protect livestock and public trust wildlife.
  - Establish grazing guidelines and standards to protect native wildlife - including gray wolf, native fish and plants;



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- Establish guidelines and standards that suspend grazing authorization in upland meadows and other high-concentration grazing areas where soil damage and loss of ground cover has occurred in 85% of historic range of variability (including pre-grazing of domestic livestock).
- Modify allotment boundaries to close the Kettle Crest above 5,000' to all permitted cattle and sheep grazing to protect the Pacific Northwest National Scenic Trail, sensitive plants, wildlife and water sources.
- Range permittees must repair damage their livestock do to recreation trails and water sources.
- To the extent feasible, require the use of natural materials to prevent cattle from grazing within the historic high-water mark along fish bearing streams.